

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MANDZELA ZHOCELIN-PATRICK
an Individual,

Plaintiff,

v.

RITZIO PURCHASE LIMITED,
a Cyprus company,

Defendant.

No. 2:17-cv-00002 RAJ

**NOTICE OF INTENT
TO FILE A MOTION TO SET ASIDE
CLERK'S ENTRY OF DEFAULT**

Defendant Ritzio Purchase Limited ("Ritzo"), respectfully provides notice to the Clerk and Plaintiff that Ritzio intends to file a Motion to Set Aside the Clerk's Entry of Default entered in this case on July 21, 2017 (Dkt. # 12).

Ritzio's Seattle-based attorney continues to prepare the appropriate papers, but the combination of disparate time zones, significant language barriers, and an extraordinarily large fact record (the Complaint and related Exhibits (Dkt. # 1) are 751 pages in length) have meant that a substantive response is taking extra-ordinary time to prepare.

NOTICE OF INTENT TO FILE A MOTION TO SET ASIDE
CLERK'S ENTRY OF DEFAULT - 1
Case No. 2:17-cv-00002 RAJ

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1 DATED this 31st day of August, 2017.

2 FOSTER PEPPER PLLC

3 /s/ Douglas A. Grady

4 Douglas A. Grady, WSBA #36100

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NOTICE OF INTENT TO FILE A MOTION TO SET ASIDE
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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/Douglas A. Grady

NOTICE OF INTENT TO FILE A MOTION TO SET ASIDE
CLERK'S ENTRY OF DEFAULT - 3
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